

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	Case No. 24-06532
Adrian Potrzebowski	)	Chapter 13
	)	Judge: A. Benjamin Goldgar
Debtor	)	

Adrian Potrzebowski  
895 Penny Ln  
Buffalo Grove, IL 60089

MANUEL A CARDENAS & ASSOCIATES  
2059 N WESTERN AVE  
CHICAGO, IL 60647

**NOTICE OF MOTION**

Please take notice that on June 28, 2024 at 10:30 am, a representative of this office shall appear before the Honorable Judge A. Benjamin Goldgar, or any judge sitting in that judge's place, either in courtroom 642 of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn St., Chicago, IL 60604 or electronically as described below and present the Trustee's motion a copy of which is attached.

**Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.**

**To appear by Zoom using the internet,** use this link: <https://www.zoomgov.com/join>. Then enter the meeting ID and password.

**To appear by Zoom using a telephone,** call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

**Meeting ID and password.** The meeting ID for this hearing is **160 817 7512** and the passcode is **623389**. The meeting ID and passcode can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion without a hearing.

801 Warrenville Road, Suite 650  
Lisle, IL 60532-4350  
Ph: (630) 981-3888

/s/ Glenn Stearns  
\_\_\_\_\_  
FOR: Glenn Stearns, Chapter 13 Trustee

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	Case No. 24-06532
Adrian Potrzebowski	)	Chapter 13
	)	Judge: A. Benjamin Goldgar
Debtor	)	

**CERTIFICATE OF SERVICE**

I, Asira Hayes,

☐ an attorney, certify

or

☒ a non-attorney, declare under penalty of perjury under the laws of the United States of America

that I served a copy of this notice and the attached motion on each entity shown below at the address shown and by the method indicated on June 21, 2024 at 5:00p.m. .

MANUEL A CARDENAS & ASSOCIATES  
2059 N WESTERN AVE  
CHICAGO, IL 60647

via CM/ECF

Adrian Potrzebowski  
895 Penny Ln  
Buffalo Grove, IL 60089

U.S. mail

801 Warrenville Road, Suite 650  
Lisle, IL 60532-4350  
Ph: (630) 981-3888

/s/ Asira Hayes  
\_\_\_\_\_  
FOR: Glenn Stearns, Chapter 13 Trustee

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	Case No. 24-06532
Adrian Potrzebowski	)	Chapter 13
	)	Judge: A. Benjamin Goldgar
Debtor	)	

**MOTION TO DISMISS FOR UNREASONABLE DELAY**

Now comes Glenn Stearns, Chapter 13 Trustee, and requests dismissal of the above case pursuant to 11 U.S.C. Section 1307 (c) and in support thereof, states the following:

1. The Debtor filed a petition under Chapter 13 on Wednesday, May 1, 2024.
2. The Debtor has failed to:
  - a. Conclude the regularly scheduled Section 341 Creditor Meeting.
  - b. Provide all required pay advices.
3. As a result, the Debtor has failed to comply with the Bankruptcy Code and has caused an unreasonable delay that is prejudicial to creditors.

WHEREFORE, the Trustee prays this case be dismissed for cause pursuant to Section 1307 (c).

Glenn Stearns, Chapter 13 Trustee  
801 Warrenville Road, Suite 650  
Lisle, IL 60532-4350

Respectfully Submitted;

/s/ Glenn Stearns

\_\_\_\_\_  
FOR: Glenn Stearns, Chapter 13 Trustee